

AO 91 (REV.5/85) Criminal Complaint

AUSA Steven A. Block (312) 886-7647

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

UNDER SEAL

CRIMINAL COMPLAINT

ADEMOLA ADESOKAN;  
TAJUDEEN RABIU;  
OLUSOLA AROJOJOYE;  
RICHARD ADEKANBI;  
EDWARD ADEKANBI;  
AKEEM OGUNSEGUN;  
KENNETH KORMOI; and  
QUINTIN HENDERSON

CASE NUMBER:

**FILED**

**09CR 365**

APR 20 2009

APR 20 2009

MICHAEL W. DOBBINS

CLERK, U.S. DISTRICT COURT

I, the undersigned complainant, being duly sworn on oath, state that the following is true and correct to the best of my knowledge and belief: From in or about October 2005 to in or about May 2008, in the Northern District of Illinois, Eastern Division, and elsewhere, ADEMOLA ADESOKAN; TAJUDEEN RABIU; OLUSOLA AROJOJOYE; RICHARD ADEKANBI; EDWARD ADEKANBI; AKEEM OGUNSEGUN; KENNETH KORMOI; and QUINTIN HENDERSON, defendants herein:

did knowingly execute a scheme and artifice to defraud financial institutions and obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody or control of, financial institutions, including JPMorgan Chase and Honeywell Federal Credit Union, by means of materially false or fraudulent pretenses, representations, and promises, by causing Honeywell Federal Credit Union to transfer \$140,000 to an account held by Dayo Construction and CF at JPMorgan Chase;

in violation of Title 18, United States Code, Section 1344. I further state that I am an Inspector with the Postal Inspection Service, and that this complaint is based on the facts contained in the Affidavit which is attached hereto and incorporated herein.



\_\_\_\_\_  
Signature of Complainant  
MARTIN BRICE  
Inspector, Postal Inspection Service

Sworn to before me and subscribed in my presence,

April 20, 2009

Date

at Chicago, Illinois

City and State

JEFFREY COLE, U.S. Magistrate Judge

Name & Title of Judicial Officer



\_\_\_\_\_  
Signature of Judicial Officer

**AFFIDAVIT IN SUPPORT OF CRIMINAL  
COMPLAINT AND SEIZURE WARRANT**

I, MARTIN BRICE, being duly sworn, state as follows:

**Introduction**

1. I am an Inspector with the Postal Inspection Service, and have been so employed for 18 years. My current responsibilities include the investigation of white collar crime, including identity theft, and mail, wire, and bank fraud. Based on my training and experience, I am familiar with the techniques used by persons engaged in such unlawful activities. As part of this assignment, I have received formal training with the Postal Inspection Service and training through contact with experts from various law enforcement agencies and financial institutions. I have initiated and participated in criminal investigations involving undercover transactions, the execution of search warrants, and the review of various types of physical and electronic surveillance.

2. This affidavit is submitted in support of a criminal complaint alleging that ADEMOLA ADESOKAN, TAJUDEEN RABIU, OLUSOLA AROJOJOYE, RICHARD ADEKANBI, EDWARD ADEKANBI, AKEEM OGUNSEGUN, KENNETH KORMOI, and QUINTIN HENDERSON did knowingly execute a scheme and artifice to defraud financial institutions, including Honeywell Federal Credit Union, Bank of America, JPMorgan Chase, LaSalle Bank, Charter One Bank, Fifth Third Bank, TCF Bank, and Washington Mutual Bank, and to obtain moneys, funds, credits, assets, securities and other property owned by, or under the custody and control of these and other financial institutions, by means of materially false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

3. This affidavit is also submitted in support of a seizure warrant for the

property identified below, on the ground that said property is personal property derived from proceeds traceable to violations of the bank fraud statute, 18 U.S.C. § 1344, and thus is subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C). The property to be seized is one 2006 Infinity M45-V8, VIN JNKBYO1E96M204744, registered to ADEMOLA ADESOKAN.

4. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging the defendants with bank fraud and obtaining a seizure warrant for the property described above, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendants committed the offense alleged in the complaint.

5. This affidavit is based on my personal knowledge, information provided to me by other law enforcement agents and witnesses, and my review of documents I have gathered in the course of this investigation, as well as documents I have received from investigators associated with the financial institutions named in this affidavit.

6. As set forth in more detail below, in connection with this investigation, there is probable cause to believe that, since at least as early as October 2005 and continuing to in or about May 2008, ADEMOLA ADESOKAN, TAJUDEEN RABIU, OLUSOLA AROJOJOYE, RICHARD ADEKANBI, EDWARD ADEKANBI, AKEEM OGUNSEGUN, KENNETH KORMOI, and QUINTIN HENDERSON, and others, have participated in a scheme to defraud financial institutions, including Honeywell Federal Credit Union, Bank of America, JPMorgan Chase, LaSalle Bank, Charter One Bank, Fifth Third Bank, TCF Bank, and Washington Mutual Bank, in violation of Title 18, United States Code, Section 1341, 1343, and 1344, and committed aggravated identity

theft, in violation of Title 18, United States Code, Section 1028A.

**Participants in the Scheme**

7. A review of bank, credit card, and phone records, and other documentary evidence, as well as interviews with victims and others, reflects that the scheme involved the following individuals, among others:

a. ADEMOLA ADESOKAN has used fraudulent and counterfeit identification in the names of identity theft victims CF, JR, RC, MS, AP, JW, FW, and others, to open fraudulent bank accounts, divert legitimate accounts, and open fraudulent commercial mail receiving agency (CMRA) mailboxes to effectuate the scheme. A CMRA is a business, such as a UPS Store or Mailboxes Etc., where customers can rent mailboxes to receive mail and packages. ADESOKAN and others have used these and other stolen identities to open fraudulent bank accounts that were used to receive money stolen from the victim financial institutions. On August 21, 2006, ADESOKAN was arrested by local police for attempting to deposit a stolen check. As described in greater detail below, at the time of his arrest, ADESOKAN had in his possession a counterfeit driver's license in the name of an identity theft victim, a credit card in the name of another victim, personal information regarding other identity theft victims, and documents relating to fictitious businesses used to effectuate the scheme described herein.

b. TAJUDEEN RABIU was employed as a teller at Washington Mutual Bank from approximately September 2003 to July 2005, LaSalle Bank from approximately October 2005 to May 2006, and Fifth Third Bank from approximately August 2006 to February 2007. Bank records show that RABIU used his position as a teller to access customers' account records to determine which customers had large account balances. RABIU and others then diverted

the addresses associated with these accounts to CMRA mailboxes under his and his co-schemers' control. RABIU also has used fraudulent and counterfeit identification in the names of identity theft victims KT, RD, RS, and others, to open fraudulent CMRA mailboxes. These addresses were then provided to banks on fraudulent applications and used to divert legitimate accounts to the CMRA mailboxes under the schemers' control. RABIU'S cell phone records show approximately 153 calls to and from ADEMOLA ADESOKAN between April 2006 and February 2007. On September 11, 2007, agents executed a search warrant at RABIU'S residence. Agents seized numerous documents tying RABIU to the scheme, including documents containing the names, Social Security numbers, and account numbers of Fifth Third Bank and Washington Mutual Bank customers, and counterfeit driver's licenses and Social Security cards that had the names of identity theft victims. Bank and phone company records show that RABIU'S cell phone had been used to call JPMorgan Chase with regard to 14 fraudulent bank accounts opened by him or his co-schemers.

c. OLUSOLA AROJOJOYE has used fraudulent and counterfeit identification in the names of identity theft victims LE, JF, GW, DG, DM, ED, JH, DE, and others, to open fraudulent bank accounts, divert legitimate accounts, and open fraudulent CMRA mailboxes to effectuate the scheme. On March 5, 2008, AROJOJOYE was arrested by local police after he presented a stolen credit card and a counterfeit driver's license to purchase Moneygram money orders at a Wal-Mart. Incident to AROJOJOYE'S arrest and a subsequent search warrant, investigators recovered a counterfeit driver's license and Social Security card in the name of an identity theft victim, numerous debit cards in the names of identity theft victims, passport photos of himself and several of the co-schemers, and notes detailing personal and account information for bank customers. Moreover, a search of AROJOJOYE'S computer and flash drive revealed dozens

of images of counterfeit driver's licenses, fraudulent City of Chicago business licenses, photographs, and fraudulent business invoices used to effectuate the scheme.

d. AKEEM OGUNSEGUN worked as a Senior Finance Administrator at Navistar Financial Corporation from approximately March 2006 through approximately September 2007. As part of his job responsibilities, OGUNSEGUN had access to checks and account records belonging to Navistar. As further described below, in August 2007, OGUNSEGUN stole two checks payable to Navistar Leasing Company, a subsidiary of his employer, totaling \$441,899, and provided them to RABIU for the purpose of converting the checks to cash for his and his co-schemers' own use.

e. RICHARD ADEKANBI has used fraudulent and counterfeit identification in the names of identity theft victims TO, RW, CB, and others, to open fraudulent bank accounts, divert legitimate accounts, and open fraudulent CMRA mailboxes to effectuate the scheme. On January 24, 2007, police officers executed a search warrant at the Park Forest home shared by RICHARD and EDWARD ADEKANBI and their mother. Police recovered numerous items relating to the scheme from RICHARD ADEKANBI's bedroom. Among the items recovered were credit reports of various individuals, notes containing customer account information, debit cards in the names of several individuals, Washington Mutual Bank checks in the name of an identity theft victim, and counterfeit driver's licenses and Social Security cards used by RICHARD ADEKANBI and other co-schemers to effectuate the scheme.

f. EDWARD ADEKANBI has used fraudulent and counterfeit identification in the names of identity theft victims AP2, AP3, and others, to open fraudulent bank accounts, divert legitimate accounts, and open fraudulent CMRA mailboxes to effectuate the scheme.

One of the CMRA mailboxes opened by EDWARD ADEKANBI received credit card terminals sent by American Express and First Data Merchant Services that were used by the co-schemers to incur fraudulent charges. RICHARD ADEKANBI and EDWARD ADEKANBI are brothers.

g. QUINTIN HENDERSON has used fraudulent and counterfeit identification in the names of identity theft victims CC, JF, and others, to open fraudulent bank accounts, divert legitimate accounts, and open fraudulent CMRA mailboxes to effectuate the scheme.

h. KENNETH KORMOI has used fraudulent and counterfeit identification in the names of identity theft victim GB and others, to open fraudulent bank accounts, divert legitimate accounts, and open fraudulent CMRA mailboxes to effectuate the scheme.

#### **Victim Financial Institutions**

8. Based on my review of documents obtained from the victim financial institutions, at all times material to the scheme described in this affidavit, the accounts of victim banks Bank of America, JPMorgan Chase, Washington Mutual Bank, Fifth Third Bank, Charter One Bank, LaSalle Bank, and TCF Bank were insured by the Federal Deposit Insurance Corporation. Honeywell Federal Credit Union was a credit union whose accounts were insured by the National Credit Union Share Insurance Fund.

#### **Overview of Scheme**

9. Law enforcement authorities have obtained evidence that the defendants have participated in a scheme to defraud financial institutions and others of over \$2,000,000. ADESOKAN, RABIU, AROJOJOYE, RICHARD ADEKENBI, and others fraudulently obtained identity information belonging to customers of victim financial institutions and other individuals. ADESOKAN, RABIU, AROJOJOYE, RICHARD ADEKENBI, and others used these identifiers



to access victims' bank accounts and home equity lines of credit, and to apply for credit card accounts in their names. ADESOKAN, RABIU, AROJOJOYE, RICHARD ADEKENBI and others then used the bank accounts, home equity lines of credit, and credit card accounts, to purchase goods and services, wire funds, and withdraw funds for their own purposes.

10. To effectuate the scheme, ADESOKAN, RABIU, AROJOJOYE, RICHARD ADEKENBI, KENNETH KORMOI, QUINTIN HENDERSON, EDWARD ADEKANBI, and others rented mailboxes at CMRA's, such as the UPS Store, using fraudulent identification and documents created by stealing the identities of unsuspecting individuals. The co-schemers then used these CMRA mailboxes as the addresses on fraudulently opened and diverted bank accounts. ADESOKAN, RABIU, AROJOJOYE, and others, subsequently transferred the stolen funds to other bank accounts they had opened using fraudulently obtained identity information and eventually converted the funds into cash for their personal use.

11. To further effectuate the scheme to defraud, RABIU used his position as a teller at several Chicago-area banks, including LaSalle Bank, Fifth Third Bank, and Washington Mutual Bank, to obtain customer account information that allowed him and his co-schemers to divert those accounts to addresses under their control.

12. In another aspect of the scheme, ADESOKAN, AROJOJOYE, KORMOI, and HENDERSON used CMRA mailboxes and bank accounts opened using stolen identity information to open fraudulent business accounts with First Data Merchant Services, a credit card processor, in order to receive credit card terminals in the names of fictitious businesses. The co-schemers then used the credit card terminals to process charges to credit card numbers they had stolen and to credit card accounts they had opened using the names of victims whose identities they

had stolen.

13. In addition, AKEEM OGUNSEGUN stole checks totaling \$441,899 payable to his employer, Navistar Financial Corporation, and provided them to co-schemer TAJUDEEN RABIU. RABIU, AROJOJOYE, ADESOKAN, KORMOI, HENDERSON, and others then diverted the stolen Navistar funds to various bank accounts under their control and converted the funds into cash for their own use.

**Stolen Convenience Checks**

**(ADESOKAN, RABIU, AROJOJOYE,  
RICHARD ADEKANBI and EDWARD ADEKANBI)**

***Victim MV and ADESOKAN's August 21, 2006 Arrest***

14. On or about August 21, 2006, ADESOKAN was arrested at Washington Mutual Bank in South Chicago Heights after he attempted to deposit a stolen \$24,500 MBNA credit card convenience check belonging to MV into an account in the name of RC and Cavalli Construction.<sup>1</sup> Washington Mutual bank records show that the RC account was opened on June 20, 2006, and had an account address of 33 Churn Road in Matteson, Illinois, and a mailing address of a 3011 W. 183rd St., Box 300, Homewood, Illinois, which is a UPS Store. Bank records also show that the account had been opened using an RC driver's license. At the time of his arrest, ADESOKAN at first identified himself to police as RC and provided them a counterfeit Georgia driver's license in that name. After attempting to flee from the police, he subsequently admitted to

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<sup>1</sup> To protect the privacy of the identity theft victims, I have identified each victim in this affidavit only by their initials. Postal Inspectors have attempted to contact all of the victims identified in this affidavit to confirm that they did not authorize the transactions described herein. For the few victims inspectors were unable to locate, I have reviewed bank records, CMRA records, and other documents to determine that the victims did not authorize the transactions or open the accounts or mailboxes described in this affidavit.

police that he was really ADEMOLA ADESOKAN and that the RC driver's license was counterfeit.

15. Investigators visited the UPS Store in Homewood and learned that Box 300 was rented in the name of CB using a counterfeit South Carolina driver's license. Documents received from the CMRA show that the person who rented the mailbox purporting to be CB, and depicted on the counterfeit CB driver's license, is really RICHARD ADEKANBI.

16. ADESOKAN'S vehicle, searched incident to his August 21, 2006 arrest, contained information regarding several individuals unrelated to ADESOKAN, including personal identifiers and bank account information. Among the items recovered was a Bank of America folder that the bank provides to new customers. The folder contained blank courtesy starter checks from Bank of America, numbered 0091 through 1000 for account number \*\*\*\*\*2257, such as the kind banks issue to customers when they open an account and do not yet have checks printed with their name and address. A customer receipt, showing a \$200 deposit to this account, was also in the folder. Documents received from Bank of America show that this account was opened on August 11, 2006, in the name of Yomi Construction/MS. The address used for this account was the UPS Store at 3011 W. 183<sup>rd</sup> St. (Box 320), the same UPS Store listed on the RC account into which ADESOKAN had attempted to deposit the stolen MV convenience checks. On or about January 24, 2007, a counterfeit MS Indiana driver's license, bearing ADESOKAN'S photo, was recovered during execution of a search warrant at the home of RICHARD and EDWARD ADEKANBI.

17. ADESOKAN'S vehicle also contained TCF check No. 1061 for an account in the name of Cavalli Construction Company (account number \*\*\*\*\*1513), also with mailbox 300 at the UPS Store in Homewood listed as the address. The Bank of America folder also contained articles of incorporation and correspondence from the IRS with regard to Yomi Construction Co.,

also with the same Homewood CMRA address (Box 320). The articles of incorporation listed MA as initial registered agent for Yomi Construction. The vehicle also contained U.S. Postal Service express mail receipts dated January 30, 2006, showing that a parcel was mailed from AP at 3011 W. 183rd St., Homewood, Illinois (the Homewood UPS Store) to James Omotosho in Ellenwood, Georgia. Another receipt dated February 21, 2006 was sent from Dayo Construction at the Homewood UPS Store to Omotosho. James Omotosho is currently under indictment in Georgia for bank fraud and aggravated identity theft.

18. On or about June 30, 2006 and July 7, 2006, James Omotosho was captured on Bank of America surveillance videos making deposits into the Bank of America Dayo Construction account in Georgia.<sup>2</sup> The account had been opened using the identifiers of CF. On or about June 29, 2006, and again on July 4 and July 12, 2006, ADESOKAN was seen on video surveillance making withdrawals from the same account in Illinois. Investigators have observed ADESOKAN at Omotosho's residence in Georgia on at least one occasion, and ADESOKAN has listed Omotosho as his employer when applying for a loan with Bank of America.

19. As part of this investigation, investigators visited the UPS Store at 3011 W. 183rd St., Homewood, Illinois, and learned that ADESOKAN had rented mailbox number 348

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<sup>2</sup> Based on my training and experience, and conversations with bank officials, I know that banks routinely utilize surveillance cameras to monitor their premises and customers making transactions. Bank security officers are able to use the time recorded on the surveillance footage, along with information captured for each ATM and teller transaction, to accurately determine which individual pictured in surveillance footage is responsible for a specific transaction. For example, surveillance footage showing an individual conducting a transaction at teller window #1 will show the time that individual was at the window. That information can be cross-referenced with transaction records from window #1 that also includes the time each transaction was made. In this case, that surveillance video of Omotosho corresponds with the times of the deposits into the Dayo Construction account.

under the name JR. Documents obtained from the UPS Store showed that ADESOKAN had opened the JR mailbox using a counterfeit Ohio driver's license bearing his photograph and a Charter One Bank debit card in the name of JR. Charter One records revealed that ADESOKAN had opened the Charter One account using the counterfeit JR license. The account was opened using an address of 33 Churn Road, Matteson, Illinois. On or about February 2 and 3, 2006, bank surveillance video shows ADESOKAN depositing two stolen MBNA convenience checks totaling \$12,025 bearing the names SM and KE of 678 N. Peoria St, Chicago, IL 60622 into the JR account. On or about February 3, 2006, bank surveillance video also shows ADESOKAN withdrawing funds from the fraudulent JR account twice at a teller window and twice at an ATM. According to bank records, ADESOKAN used the driver's license number from the counterfeit JR license to make the February 2, 2006 teller withdrawals. ADESOKAN was able to withdraw approximately \$6,450 before the bank froze the account.

*Victims WF and MM*

20. CMRA records show that on or about January 13, 2007, TAJUDEEN RABIU rented mailbox 426 at 430 E. 162nd Street, a CMRA in South Holland, under the name KT using a counterfeit Indiana driver's license bearing his photograph. On that same date, RICHARD ADEKANBI rented mailbox 425 at this same CMRA, under the name TO using a counterfeit Indiana driver's license. On or about January 24, 2007, investigators recovered both the TO license, bearing RICHARD ADEKANBI'S photograph, and the mailbox 425 rental agreement, during execution of a search warrant at RICHARD and EDWARD ADEKANBI'S residence. On or about September 11, 2007, investigators recovered both the mailbox 426 rental agreement and the counterfeit KT driver's license, bearing RABIU'S photograph, during execution of a search warrant at RABIU'S residence.

21. Bank records show that on or about November 6, 2006, a fraudulent Washington Mutual Bank account was opened using the identifiers of LM. The Washington Mutual account (account number \*\*\*\*\*3055) remained inactive until the address on the account was changed on or about January 30, 2007. Bank records show that on or about January 13, 2007, the address was changed to the KT mailbox rented by RABIU at the South Holland CMRA. The next day, the LM account received a deposit of approximately \$6,950 drawn from a fraudulent JPMorgan Chase credit card account opened with identifiers belonging to victim WF. On March 5, 2007, the LM account received a deposit of approximately \$6,450 drawn from another fraudulent JPMorgan Chase credit card opened using the identifiers of victim MM. On or about February 7, 2007, \$5,000 was withdrawn from the LM account. Additional withdrawals were made on February 15, March 12, and May 3, 2007.

22. The WF and MM JPMorgan Chase credit card accounts were opened by individuals submitting internet applications. Two accounts were opened for WF on January 21 and 22, 2007 (account numbers \*\*\*\*\*9376 and \*\*\*\*\*8698), and two accounts were opened for MM on February 22, 2007 (account numbers \*\*\*\*\*5884 and \*\*\*\*\*3157). The convenience check deposited into the LM account from the WF account was drawn from the 9376 account. Another stolen convenience check was drawn from the WF 8698 account and deposited into another fraudulent Washington Mutual Bank account opened in the name of MF. The MF account listed the same South Holland CMRA address where RABIU had opened a mailbox using the fraudulent KT identification.

23. On or about March 8, 2007, a convenience check drawn from the MM 5884 account in the amount of approximately \$6,500 was deposited into another fraudulent Washington

Mutual bank account that had been opened using the name and identifiers of victim KO. KO's name was annotated in paperwork recovered from RABIU'S residence. The paperwork also contained the MF Washington Mutual account number.

*Victim JS*

24. On or about March 5, 2007, the fraudulent MF Washington Mutual account received a deposit of a JPMorgan Chase Bank convenience check for approximately \$6,450 drawn off a credit card account opened using the identifiers of victim JS (account number \*\*\*\*\*3207). The JS credit card account was opened by an application submitted through the internet on February 22, 2007.

25. Banks and credit card companies regularly record the internet protocol (IP) addresses used by online applicants as a means of tracking from where online applications are submitted. Every computer using the internet is assigned a unique IP address that identifies that specific computer. An IP address is much like a telephone number or mailbox address, in that no two computers utilize the same IP address at the same time. Bank documents show that the individual submitting the JS application used the same IP address used to open the two fraudulent accounts in the name of MM described above (§ 22). I can conclude, therefore, that the JS and MM accounts were opened by an individual or individuals utilizing the same computer.

26. On or about March 5, 2007, another fraudulent Washington Mutual Bank account in the name of GC (account number \*\*\*\*\*6672) received a \$6,617.22 deposit drawn from a JS JPMorgan Chase credit card account. Papers recovered from TAJUDEEN RABIU's residence during execution of a search warrant contained the address used to open the JS credit card account, as well as the exact dollar amount of the convenience check deposited into GC's account.

27. Based on my training and experience, and interviews with bank officials, I know that banks routinely capture the telephone numbers of customers that call the bank to inquire about their accounts. Bank records show that a cell phone number TAJUDEEN RABIU admitted belonged to him, (773) 780-6468, called JPMorgan Chase regarding the accounts opened under the names WF and JS. JPMorgan Chase records show that this phone number is linked to several other fraudulent accounts opened with stolen victim identifiers. For example, on March 1 and 7, 2007, a person using RABIU'S number called JPMorgan Chase regarding a credit card account held by victim RF (account number \*\*\*\*\*2453). On February 27, 2007, a convenience check for approximately \$9,335 was drawn from the account and deposited into a fraudulent Washington Mutual Bank account in the name of victim BW (account number \*\*\*\*\*8806), which had been opened on February 27, 2007.

*Victim WM*

28. On or about March 19, 2007, the fraudulent BW account received another convenience check deposit of approximately \$3,470 drawn from a JPMorgan Chase credit card account opened using the identifiers of victim WM (account number \*\*\*\*\*6710). The WM credit card account was opened on March 7, 2007. Another WM account was opened on the same day, and a convenience check for \$3,650 was deposited into a fraudulent Washington Mutual Bank account opened using the name and identifiers of victim AD on January 23, 2007. Victim BW's name was annotated on papers recovered from RABIU'S residence during execution of the search warrant. In addition, bank records show that on March 19 and 27, 2007, RABIU'S cell phone was used to call JPMorgan Chase with regard to the WM account.



*Victim PB*

29. On or about February 22, 2007, the AD Washington Mutual account received a deposit of a JPMorgan Chase convenience check for approximately \$6,290 drawn from another fraudulent account opened with the name and identifiers of PB. On or about February 11, 2007, two JPMorgan Chase credit card accounts had been opened using PB's identifiers by applications submitted through the internet. The check payable to AD was drawn from account \*\*\*\*\*9532. On or about February 22, 2007, another convenience check for approximately \$8,870 was drawn from account \*\*\*\*\*1277, and deposited into another fraudulent Washington Mutual account opened using the name and identifiers of victim RM. RM's Washington Mutual account number and the exact amount of the AD convenience check were annotated in paperwork seized during execution of the search warrant at TAJUDEEN RABIU'S residence. Bank records show that on February 26, 2007, RABIU'S cell phone was used to call JPMorgan Chase with regard to both PB accounts.

*Victim TM*

30. JPMorgan Chase records show that on or about March 15, 2007, two JPMorgan Chase credit card accounts were opened using the name and identifiers of victim TM (account numbers \*\*\*\*\*2797 and \*\*\*\*\*6334). Bank records also show that on March 27, 2007, a cell phone number associated with RABIU was used to call JPMorgan Chase with regard to both accounts. Washington Mutual Bank checks, bearing the name of victim TM, were recovered during execution of a search warrant at RABIU's residence on September 11, 2007. Convenience checks were drawn from both TM accounts and deposited into other fraudulent business accounts opened with Bank of America as described below.

31. On or about March 28, 2007, a convenience check for approximately \$7,980 was drawn from the TM 6334 JPMorgan Chase credit card account and deposited into a bank account held by Now N Touch Communications Co. (account number \*\*\*\*\*6293), which had been opened on February 12, 2007. The signer listed on the account was identity theft victim DE. A pre-paid Visa Rush Card bearing DE's name was recovered from OLUSLA AROJOJOYE incident to his March 5, 2008 arrest.

32. On or about March 28, 2007, a convenience check for approximately \$7,890 was drawn from the TM 2797 JPMorgan Chase account and deposited into a Bank of America account held by Joanns Furniture and Appliances (account number \*\*\*\*\*1738), which had been opened on February 14, 2007. The signatory on the account was identity theft victim JL. Washington Mutual check stock bearing the name TM was recovered at RABIU's residence during execution of the search warrant. The Washington Mutual checks had the address of 122 E.35th Street, Suite 125, Chicago IL, 60616. This is the CMRA mailbox that RABIU rented under the name KT, as described in paragraph 20. The TM Washington Mutual account had deposits of two Wal-Mart Moneygram money orders for approximately \$960 and \$975. Documents obtained from Moneygram show that these money orders were purchased with a Bank of America debit card linked to a fraudulent Navistar Leasing/BK account utilized by RABIU, which is described later in this affidavit (§ 57).

33. On or about February 12, 2007, OLUSOLA AROJOJOYE rented mailbox 262 at a CMRA, PostNet, using counterfeit identification in the name AP4. Among the documents received from PostNet is a photocopy of the identification used to open the mailbox, which bears AROJOJOYE's photograph. This address was also provided to Bank of America to open an account

for Joanns Furniture and Appliances, which received one of the fraudulent TM JPMorgan Chase convenience checks as set forth above.

*Victim RJ*

34. Documents received from Mailbox Junction, a CMRA in Chicago, show that on or about January 13, 2007, TAJUDEEN RABIU rented mailbox 144 at Mailbox Junction under the name KT. The documents show that RABIU provided the CMRA with a counterfeit KT driver's license bearing his photograph to open the mailbox. On March 8, 2007, this address was provided to Bank of America to open an account in the name of Compusale Management Company (account number \*\*\*\*\*5594). The signatory on the account was identity theft victim DT. On or about March 27, 2007, this account received a deposit of a JPMorgan Chase convenience check for approximately \$7,950, drawn from a credit card account opened in the name of identity theft victim RJ (account number \*\*\*\*\*2748). An image of a counterfeit Illinois driver's license in the name DT and a fraudulent Compusale Management Company Chicago business licence were found on AROJOJOYE'S computer flash drive.

35. On or about March 15, 2007, another JPMorgan Chase credit card account was opened in the name of identity theft victim RJ through an internet application (account number \*\*\*\*\*4750). On or about March 28, 2007, a convenience check for approximately \$7,985 was made payable to Livewory Enterprise and deposited into a fraudulent Bank of America account opened on March 13, 2007, using the name and identifiers of identity theft victim DF. Bank records show that the address provided to Bank of America for the DF account was the previously mentioned mailbox 125 at @ Mailboxes Plus opened by RABIU (¶ 32). Investigators recovered a fraudulent City of Chicago business license for Livewory Enterprise from AROJOJOYE'S computer flash drive

as well as a counterfeit DF driver's license.

*Victim ML*

36. On the same date that RABIU rented mailbox 125 at @ Mailboxes Plus, March 7, 2007, CMRA records show that he also rented mailbox 228 at C & L Onestop Postal, a CMRA in Chicago. RABIU rented this mailbox using the same counterfeit KT driver's license he used to rent mailbox 125 at @ Mailboxes Plus. Bank records show that on or about May 9, 2007, mailbox 228 at C & L Onestop Postal was provided on an internet application to open a Washington Mutual account using the name and identifiers of identity theft victim JG (account number \*\*\*\*\*2137). The opening deposit to this account was a JPMorgan Chase convenience check for approximately \$6,760 drawn from an account opened on April 18, 2007 using the name and identifiers of identity theft victim ML. On or about May 16, 2007, a \$4,900 cash withdrawal posted to this account. The image of a counterfeit Illinois driver's license in the name of JG was recovered from AROJOJOYE'S computer flash drive.

*Victim JG*

37. On or about February 27, 2007, internet applications were submitted for two JPMorgan Chase credit card accounts in the name of identity theft victim JG (account numbers \*\*\*\*\*3379 and \*\*\*\*\*0083). These applications both identified mailbox 228 at C & L Onestop Postal, opened by RABIU, as the account address (§ 36). As discussed later in this affidavit, the JG credit card accounts also were used to submit fraudulent charges to a credit card terminal obtained in the name of fictitious business Creole Enterprises (§ 78).

*Victim AD*

38. On or about January 7, 2007, internet applications were submitted for two

JPMorgan Chase credit card accounts in the name of identity theft victim AD (account numbers \*\*\*\*\*6568 and \*\*\*\*\*5223). On or about January 18, 2007, a \$6,600 convenience check was drawn from the 5223 account and deposited into a JPMorgan Chase account in the name of Olad Enterprise Inc (account number \*\*\*\*\*8855). Bank documents show that RICHARD ADEKANBI opened the Olad Enterprise account on November 24, 2006, using the name and identifiers of identity theft victim RW. The debit card associated with this account, along with a counterfeit RW Social Security card and driver's license were recovered during execution of a search warrant at the home of defendants RICHARD and EDWARD ADEKANBI. The counterfeit RW driver's license bears the photo of RICHARD ADEKANBI. On or about January 17, 2007, the debit card associated with the JPMorgan Chase 8855 account was used to purchase two Postal money orders for \$1,000 and approximately \$950, which were deposited into another Olad Enterprises account at TCF Bank. Four additional money orders bought with the same debit card, totaling approximately \$3,500, were recovered during the execution of a search warrant at RICHARD and EDWARD ADEKANBI's residence. In total, approximately \$6,550 was withdrawn from this account before the bank froze the account.

*Victims CB and MD*

39. On or about February 27, 2007, two JPMorgan Chase credit card accounts were opened using the names and identifiers of identity theft victims CB and MD (account numbers \*\*\*\*\*0711 and \*\*\*\*\*1156 respectively). Both internet applications were submitted from the same IP address. On March 9, 2007, a convenience check for approximately \$7,975 was drawn off the CB account and used as the opening deposit for a fraudulent Washington Mutual account opened using the name and identifiers of identity theft victim JL. The address used

to open the CB credit card account was found on paperwork at TAJUDEEN RABIU'S residence.

40. On or about March 9, 2007, a convenience check for approximately \$7,990 drawn from the MD account was used as the opening deposit for a fraudulent Washington Mutual account opened using the name and identifiers of identity theft victim KM. On or about April 2, 2007, the two MD credit cards were used to submit fraudulent charges at merchant CW Electronics. The MD 1156 account had two charges for approximately \$2,500 and the 3411 account had charges for approximately \$1,450 and \$2,000. On or about March 28, 2007, the 3411 account also was used to submit fraudulent charges for approximately \$1,000, \$1,500, and \$2,950 to a fictitious business, Emborgo Home and Business Renovation. CMRA documents show that AROJOJOYE had used a counterfeit LE driver's license bearing his photograph to rent mailboxes bearing that name and the name of Emorgo Home and Business Renovation. Moreover, investigators recovered from AROJOJOYE's computer a counterfeit Emborgo Home and Business Renovation City of Chicago business license, Social Security card, and utility bill. The details of the scheme involving fraudulent charges at merchant credit card terminals is discussed later in this affidavit (§ 64).

#### ***Stolen Bank of America Convenience Checks***

41. In addition to the JPMorgan Chase credit card convenience checks described above, the co-schemers had access to Bank of America credit card convenience checks, which customers had previously reported to the bank as stolen. Approximately \$79,250 worth of these stolen convenience checks were deposited into a Bank of America account opened in the name of Dayo Construction (account number \*\*\*\*\*4950), which had been opened on or about April 26, 2006 by someone using the name and identifiers of identity theft victim CF. As discussed in further detail below (§ 46), on or about May 15, 2006, ADEMOLA ADESOKAN was captured on

JPMorgan Chase surveillance video purporting to be CF and presenting a counterfeit Florida driver's license in that name while cashing a \$3,000 check drawn from the account of other fraud victims. ADESOKAN annotated the driver's license number of the counterfeit CF driver's license on the withdrawal slip. The address used to open the Dayo Construction account was box 348 at a UPS Store located at 3011 W. 183rd Street, Homewood, Illinois, which CMRA records show ADESOKAN had opened using the name and identifiers of victim JR.

42. Approximately \$31,000 in stolen Bank of America convenience checks were deposited into a Bank of America account opened using the name and identifiers of victim LM. The LM account also received checks from the Dayo Construction account opened by ADESOKAN. The address used to open the LM account was Box 498 at a UPS Store located at 2625 Piedmont Road, Atlanta, Georgia, which CMRA records show ADESOKAN had opened using the name CF and the same counterfeit Florida driver's license discussed above (§ 18). The addresses on each of these Bank of America convenience checks indicate that all of the legitimate cardholders reside in Texas. ADESOKAN was captured on bank surveillance video making withdrawals from the Dayo Construction account, and James Omotosho was captured on video making deposits to this account in Georgia (§ 18). On or about July 6 and July 12, 2006, James Omotosho was also captured on video making deposits to the LM account.

43. When AROJOJOYE was arrested by local police on March 5, 2008, officers recovered Bank of America convenience checks issued to four victims all from the state of Maine, including JP and KH, which had been reported stolen. Bank of America officials advised investigators that these checks were all part of a mass mailing for which Bank of America had sustained losses in excess of \$129,600 on 24 accounts. Bank records show that a \$3,780 check

drawn off JP's account and a \$3,880 check drawn off KH's account were made payable to Hambleton Enterprises. At the time of his arrest, AROJOJOYE had a JH/Hambleton Enterprises Bank of America debit card in his possession. AROJOJOYE'S computer flash drive contained an image of a counterfeit JH Texas driver's license.

44. Another of the stolen convenience checks belonged to Bank of America customer EW. A check for approximately \$11,800 was drawn off this account and deposited into a Wachovia Bank account in the name of Skylines Management. I have reviewed Postal Service and bank records, which show that a debit card from the Skylines Management account was used to purchase Postal money orders that were deposited into ADEMOLA ADESOKAN's personal Bank of America account. Documents obtained from Moneygram and Bank of America show that the same debit card was used to purchase Wal-Mart Moneygram money orders that were then deposited into TAJUDEEN RABIU'S personal Bank of America account.

#### **Diverted LaSalle Bank Account**

**(ADESOKAN, RABIU, and EDWARD ADEKANBI)**

#### ***Victims PC and SC***

45. LaSalle Bank customer SC has told investigators that on April 10, 2006, her husband PC made a legitimate \$100,000 deposit into their LaSalle Bank checking account. Bank records show that this transaction was handled by teller TAJUDEEN RABIU. LaSalle Bank records also indicate that on April 12, 2006 and twice on May 2, 2006, RABIU made inquiries into the C's account even though he had no legitimate business purpose for doing so. On May 5, 2006, the address of the C's LaSalle Bank checking account, home equity line of credit, and money market account, as well as their ComEd utility account, were diverted to a mailbox at a UPS Store in



Georgia. This is the same UPS Store where ADESOKAN had rented Box 498 in the name of CF as described above (§ 42). New checks were then ordered for the account and sent to mailbox 187, which was rented by someone purporting to be victim MG. Photos of the individual opening the MG mailbox were recovered from ADESOKAN'S car incident to his arrest and from RICHARD and EDWARD ADEKANBI'S residence during execution of a search warrant. At the time of his arrest, ADESOKAN had a Citibank credit card in the name of victim CR in his possession that bank records show had also been mailed to mailbox 187.

46. On or about March 20, 2006, an individual opened an account at JPMorgan Chase in the name Yomi Construction, with MS and MA listed as signatories on the account (account number \*\*\*\*\*3315). On or about May 15, 2006, the account received a deposit of two checks for \$96,289 and \$63,125 drawn from the C's LaSalle Bank account (account number \*\*\*\*\*3392) without their knowledge or authorization. That same day, a \$3,000 check was drawn from the C's account and made payable to CF, a known alias of ADESOKAN (§ 42), which was cashed at the Homewood branch of JPMorgan Chase. Forensic analysis of that check revealed latent fingerprints matching ADESOKAN, and bank surveillance video shows ADESOKAN cashing the \$3,000 check.

47. On or about May 17, 2006, a person purporting to be MS withdrew \$4,980 in cash from a teller and \$100 from an ATM from the Yomi Construction account at JPMorgan Chase. On that same date, another \$100 was withdrawn from the Yomi Construction account at a branch in Markham. On or about June 15, 2006, ADESOKAN deposited a \$3,500 check drawn off this account into his own Citibank account. On or about January 24, 2007, a counterfeit MS Indiana driver's license, bearing ADESOKAN's photograph, was recovered from the ADEKANBIS'

residence during execution of a search warrant.

48. On or about May 16, 2006, SC informed LaSalle Bank that her and her husband's account address had been changed without their permission and unauthorized withdrawals had been made from their account. LaSalle Bank subsequently froze the account and stopped payment on the \$96,289 and \$63,125 checks written to Yomi Construction.

**Diverted Honeywell Federal Credit Union Account**

**(ADESOKAN, RICHARD ADEKANBI, and EDWARD ADEKANBI)**

***Victim DM***

49. Documents received from Honeywell Federal Credit Union show that on or about January 3, 2006, an individual identifying himself as customer DM called Honeywell Federal Credit Union and changed the telephone number associated with his account (number \*\*\*\*7544). On February 9, 2006, \$140,000 was wired from the DM account to a JPMorgan Chase account held by Dayo Construction and CF (account number \*\*\*\*\*3315).

50. Bank records show that on or about January 23, 2006, ADESOKAN opened the JPMorgan Chase Dayo Construction/CF account using counterfeit identification in the name of CF. ADESOKAN opened the account using the address of a UPS Store, 15941 S. Harlem Avenue, Box 355, Tinley Park, Illinois. Management at the UPS Store in Tinley Park told investigators that an individual posing as JR, a known alias of ADESOKAN (¶ 19), attempted to rent Box 355. They refused to rent the box to the individual purporting to be JR because they had suspicions about the identification he presented, which was a counterfeit JR license bearing ADESOKAN'S photograph. Bank records show that on or about January 25, 2006, ADESOKAN changed the address on the Dayo Construction account to the address of a different UPS Store, 3011

W. 183rd Street, Box 348, Homewood, Illinois. Documents received from the Homewood UPS Store show that ADESOKAN opened Box 348 using a counterfeit JR driver's license bearing his photograph.

51. Once the stolen Honeywell funds were wired to the fraudulent Dayo Construction/CF Chase account, the funds were then transferred to still other fraudulent accounts controlled by the co-schemers. For example, on or about February 11, 2006, ADESOKAN withdrew funds from the Dayo Construction account to purchase a JPMorgan Chase official check for \$4,750 payable to AP and a \$4,850 official check payable to DM2. Bank surveillance video shows ADESOKAN at a JPMorgan Chase branch in Glenwood, Illinois purchasing these checks. A counterfeit AP driver's license, bearing ADESOKAN'S photograph, was recovered during execution of a search warrant at the residence of RICHARD and EDWARD ADEKANBI, along with counterfeit AP and DM2 Social Security cards.

52. On or about February 13, 2006, bank records show that ADESOKAN purchased more official checks payable to AP and DM2, each for \$9,850. On that same date, another official check for \$9,850 was issued payable to JR, a known alias of ADESOKAN (§ 19). The check included a notation of the driver's license number from the same counterfeit JR driver's license ADESOKAN used to rent mailbox 348 at the UPS Store in Homewood, Illinois (§ 19). On or about February 14 and 15, 2006, additional checks were made payable to CB, a known alias of RICHARD ADEKANBI (§ 15), for \$4,950, \$4,895, and \$6,450. On or about March 27, 2006, a check for \$9,100 was made payable to AP2, which was the name on the counterfeit identification and Charter One Bank debit card recovered from EDWARD ADEKANBI incident to his January 24, 2007 arrest by Olympia Fields police officers.

53. On or about February 13, 2006, eight withdrawals posted to the Dayo Construction account, totaling \$59,700. Bank records show that most of these withdrawals were made by ADESOKAN using counterfeit CF identification, and bank surveillance video shows ADESOKAN at the JPMorgan Chase branch in Homewood making at least one of these withdrawals. Additional withdrawals were made from this account on February 14, 15, and 17, totaling \$51,750. On or about March 6, 2006, JPMorgan Chase video surveillance captured ADESOKAN depositing a \$89,450 AT&T Universal Card convenience check bearing the name SJ to the Dayo Construction/CF account. SJ had reported to the banks that these convenience checks had been stolen.

54. On or about March 23, 2006, Charter One Bank surveillance video captured EDWARD ADEKANBI depositing a check for approximately \$8,250 drawn off the SJ account into an account in the name of AP2 (account number \*\*\*\*\*1888), a known alias of EDWARD ADEKANBI (¶ 52). On or about March 27, 2006, Charter One Bank video surveillance captured ADESOKAN depositing an \$8,100 check drawn off the SJ account into the same AP2 account.

55. On or about March 27, 2006, ADEMOLA ADESOKAN deposited a \$9,100 check drawn from the Dayo Construction account into the Charter One Bank account EDWARD ADEKANBI had opened in the name of AP2. As previously stated, a debit card associated with this account and a counterfeit AP2 driver's license was recovered from EDWARD ADEKANBI incident to his January 24, 2007 arrest. The AP2 account utilized the same address as the aforementioned fraudulent JR Charter One Bank account and RC/Cavalli Construction Washington Mutual account opened by ADESOKAN: 33 Churn Street in Matteson, Illinois.

56. Bank records show that on or about February 14, 2006, two checks totaling \$9,500 were drawn from the Chase Dayo Construction/CF account payable to MK. These checks were paid to a Capital One credit card account in the name of MK (account number \*\*\*\*\*0637). Records received from Capital One show that the MK Capital One credit card account was opened using the address of a CMRA, 2625 Piedmont Road, Box 187, Atlanta. The mailbox was rented by someone purporting to be victim MG. Photos of the individual that opened the MG mailbox were recovered from ADESOKAN'S car incident to his arrest and from RICHARD and EDWARD ADEKANBI'S residence during execution of a search warrant. At the time of his August 21, 2006 arrest, ADESOKAN had in his possession a fraudulent Citibank debit card in the name of CR; the CR account records listed mailbox 187 at the Piedmont Road CMRA as the account address.

#### **Stolen Navistar Checks**

**(RABIU, AROJOJOYE, OGUNSEGUN, and HENDERSON)**

57. In July 2007, Navistar Financial Services Corporation informed investigators that two checks payable to the company in the amounts of \$51,899 and \$390,000 had been stolen and deposited without company authorization into a Bank of America account in the name of BK and Navistar Leasing (account number \*\*\*\*\*4992). This account was not authorized by or affiliated with Navistar Financial Services Corporation. Bank records showed that the address used to open the BK account was really Box 67 at Park Manor Mailboxes, a CMRA that is also associated with another part of the scheme described later in this affidavit (¶ 79).

58. Investigators provided Navistar officials with several of RABIU'S known telephone numbers to determine if any of their employees had been in contact with him. Navistar's

internal phone system captures data regarding all calls made from the company, including the extension from which a call was made, the number dialed, and the time and date of the call. Navistar officials told investigators that one of their employees who had access to checks payable to the company, AKEEM OGUNSEGUN, had called one of RABIU'S numbers at least 15 times in the months leading up to the time the checks were stolen. On September 7, 2007, private investigators hired by Navistar observed OGUNSEGUN enter RABIU'S residence and stay there for approximately four hours. On or about September 11, 2007, OGUNSEGUN admitted to investigators that he stole the two Navistar checks from his employer and provided them to RABIU in exchange for an anticipated share of the proceeds.

59. The rental agreement for Box 67 at Park Manor Mailboxes showed that it had been rented by an individual purporting to be CC, and included the names BK and Navistar Leasing as authorized to receive mail. QUINTIN HENDERSON has told Postal Inspectors that he rented the mailbox under the name CC at the request of his friend AROJOJOYE. Investigators found photographs of HENDERSON when they searched OLSUOLA AROJOJOYE'S car incident to his arrest. In addition, a fraudulent BK identification document and a fraudulent Chicago business license in the name Navistar Leasing were found on OLSUOLA AROJOJOYE'S computer flash drive.

60. An employee at Park Manor Mailboxes identified TAJUDEEN RABIU as the individual who rented another mailbox, Box 80, using counterfeit identification in the name RD. Documents received from the CMRA show that the application for this mailbox also included the names BK and Compunetwork Enterprises as authorized to receive mail. The photograph on the fraudulent RD driver's license provided to Park Manor Mailboxes is TAJUDEEN RABIU. This

driver's license was recovered at RABIU's apartment during execution of a search warrant on September 11, 2007. A fraudulent Compunetwork Enterprise Inc. Chicago business license, City of Chicago Navistar Leasing business license, and counterfeit BK driver's license were later found on OLUSOLA AROJOJOYE'S computer flash drive.

61. Once the stolen Navistar funds were deposited in the fraudulent BK account, the co-schemers withdrew and concealed the funds in numerous ways. For example, records received from the Postal Service show that two debit cards linked to the fraudulent Navistar/BK accounts were used to withdraw funds to purchase Postal money orders. Two of these money orders were payable to TAJUDEEN RABIU, eight were payable to Individual A, six were payable to Individual B, and six were payable to Individual C. Two money orders payable to victim TM were deposited into a Washington Mutual Bank account. The checks from this account were recovered from RABIU'S apartment during execution of a search warrant on September 11, 2007. The same debit card was used to purchase three Wal-Mart Moneygram money orders, each for approximately \$1,000, which were also recovered from RABIU'S apartment during execution of the search warrant.

62. Bank records show that the co-schemers also accessed the stolen Navistar funds by transferring money to still other fraudulently opened bank accounts. On or about August 6, 2007, \$30,000 was transferred from the fraudulent Navistar Leasing/BK account (4992 account) into another fraudulent Bank of America account in the name of Navistar Leasing (account number \*\*\*\*\*5243). On or about August 17, 2007, \$10,000 was transferred back from the 5243 account to the 4992 account. On or about August 16 and 17, 2007, \$100,000 was transferred from the fraudulent 4992 Navistar account to yet another fraudulent Navistar account (account number

291001015230). On or about August 15, 2007, a check for \$49,822.11 was drawn from the 5230 account payable to Omawe Construction Company. On or about August 21, 2007, another check for \$68,834.09 was drawn from the same account and made payable to Omawe Construction Company (¶ 63). On or about August 23, 2007, \$17,500 was transferred from the 5243 account to the 4992 account. A counterfeit BK driver's license and City of Chicago business license for Navistar Leasing were recovered from AROJOJOYE's computer flash drive.

63. On or about June 21, 2007, two accounts were opened at Bank of America in the name Omawe Construction Company (accounts \*\*\*\*\*1256 and \*\*\*\*\*1904). The 1256 account received the \$68,834.09 check from the fraudulent Navistar account, and the 1904 account received the \$49,822.11 check. The Omawe Construction accounts were opened by an individual purporting to be DW, by submitting an internet application and a fraudulent Omawe Construction City of Chicago business license. The fraudulent business license and DW driver's license were found on AROJOJOYE'S computer flash drive, along with a forged Omawe Construction utility bill and fictitious Omawe Construction pay stubs.

#### **Fraudulent Merchant Credit Card Accounts**

**(AROJOJOYE, RABIU, RICHARD ADEKANBI,  
EDWARD ADEKANBI, HENDERSON, and KORMOI)**

64. It was further part of the scheme that AROJOJOYE, RABIU, RICHARD ADEKANBI, EDWARD ADEKANBI, HENDERSON, and KORMOI used stolen identities and stolen identity documents, along with fraudulently created documents and records, to apply for merchant credit card accounts in the names of various fictitious businesses they had created. The co-schemers would then obtain credit card terminals for these fictitious businesses and use them to



process fraudulent payments that resulted in losses to the credit card issuers and credit card processor. As described below, the co-schemers would then transfer funds from these fraudulent credit card transactions into fraudulent business accounts under their control.

***Aguirre Fitness Equipment Terminal***

65. Documents received from @ Mailboxes Plus, a CMRA in Chicago, show that on or about January 1, 2007, RICHARD ADEKANBI rented mailbox 119 at @ Mailboxes Plus using the name and identifiers of identity theft victim TO. The mailbox rental form included a notation that SA and DB were additional individuals authorized to receive mail at Box 119. In September 2006, the real DB had reported to local police that his wallet had been stolen from his residence and, shortly thereafter, someone had applied for a Nordstrom's credit card using his identifiers. The Nordstrom's application had been submitted through the internet, and included a mailing address of a CMRA in Chicago. The telephone number provided on the Nordstrom's application was registered to EDWARD ADEKANBI at 100 Birch Ave., Park Forest, Illinois. Nordstrom's captured the IP address used to submit the fraudulent DB application. Documents received pursuant to subpoena showed that the IP address used to submit the application was registered to RICHARD and EDWARD ADEKANBI'S residence.

66. On or about January 23, 2007, an individual using the name and identifiers of SA opened a Bank of America account in the name of Aguirre Fitness Equipment Co. (account number 2910291499). On the same date, SA/Aguirre Fitness Equipment applied for a credit card terminal from credit card processor First Data Merchant Services.

67. Documents received from First Data Merchant Services show that between on or about February 1, 2007 and on or about February 14, 2007, 12 fraudulent transactions totaling

approximately \$20,133 were processed through the Aguirre Fitness credit card terminal. Six different credit card account numbers were manually keyed into the terminal two times each, and the funds received from First Data Merchant Services were transferred into the SA/Aguirre Fitness Bank of America account (account number \*\*\*\*\*1499). This account had been opened on or about January 23, 2007 using the identifiers of victim SA.

***CJC Electronics Terminal***

68. Documents received from Mail Max Inc., a CMRA in Chicago, show that on or about February 2, 2007, QUINTIN HENDERSON rented mailbox 490 at Mail Max Inc. using the name and identifiers of Washington Mutual customer CC. The documents include a photocopy of a fraudulent CC driver's license bearing HENDERSON's photograph. Documents retained by the CMRA also show that HENDERSON provided a copy of a Social Security card and Texas driver's license bearing the name of victim CP as someone authorized to receive mail, and identified CJC Electronics as another entity authorized to receive mail.

69. On or about February 7, 2007, a fraudulent Bank of America account (account number \*\*\*\*\*0150) was opened in the name of CP as owner of CJC Electronics. On or about February 8, 2007, the account number, fraud address, and name were also provided on an internet application submitted to First Data Merchant Services. The IP address used to submit the First Data Merchant Services application was the same IP address used to open the fraudulent Aguirre Fitness Equipment account discussed above (¶ 66). The terminal was shipped to mailbox 490 at Mail Max rented by HENDERSON.

70. Between on or about February 17, 2007 and March 19, 2007, there were 17 fraudulent transactions processed through the CJC Electronics credit card terminal totaling

\$33,550. Five different credit card accounts were manually keyed into the fraudulently obtained terminal, and the funds received from First Data were subsequently transferred into the fraudulent CP Bank of America account.

71. Records received from credit card issuers show that many of the same fraudulent JPMorgan Chase credit card accounts used on the Aguirre Fitness Equipment terminal mentioned above were also used to incur fraudulent charges on the CJC Electronics terminal. One of the fraudulent cards used was issued in the name JC (account number \*\*\*\*\*2622). JPMorgan Chase records show that a phone number used several times to call JPMorgan Chase with regard to this account, (708) 271-0765, is the same number that had called JPMorgan Chase regarding the fraudulent AD JPMorgan Chase credit card account described earlier (¶28). The T-Mobile contract relating to this number was found during execution of a search warrant at RICHARD and EDWARD ADEKANBI'S residence. The T-Mobile contract was in the name of TO. A counterfeit TO driver's license, bearing RICHARD ADEKANBI's photograph, was also recovered. Bank records show that this same telephone number also called JPMorgan Chase approximately 20 times regarding 5 other fraudulent credit card accounts.

***Embargo Home and Business Renovation Terminal***

72. On or about February 23, 2007, QUINTIN HENDERSON rented mailbox 122 at @ Mailboxes Plus using the name and identifiers of Washington Mutual Bank customer CC. Records obtained from the CMRA include a photocopy of a CC identification document bearing HENDERSON'S photograph. Bank records show that on or about February 27, 2007, this address was provided to Bank of America to open an account under the name Embargo Home and Business Renovation (account number \*\*\*\*\*4453). Identity theft victim LE was listed as the signatory on

this account. Photocopies of a counterfeit LE driver's license bearing AROJOJOYE's photograph were obtained from another CMRA where AROJOJOYE had used it to rent a mailbox. On or about March 8, 2007, this Bank of America account number, fraud address, and name were provided to First Data Merchant Services to obtain a credit card terminal. The card processor shipped the terminal to the mailbox rented by HENDERSON.

73. Records received from First Data Merchant Services show that between on or about March 26, 2007 and March 30, 2007, 20 fraudulent transactions were processed through the Emborgo Home and Business Renovation credit card terminal totaling approximately \$31,100. Several different credit card numbers were manually keyed into the terminal, and the funds were wired into the LE Bank of America account. This account also received a deposit of approximately \$7,975 from a convenience check drawn off a fraudulently opened Chase Bank account using the name and identifiers of identity theft victim JR2. The address used on the fraudulent JR2 account was 104 Churn Road, Matteson. This address has been used by OLUSOLA AROJOJOYE, TAJUDEEN RABIU, and RICHARD ADEKANBI at various times during the scheme. For example, credit cards recovered from the ADEKANBI's residence during execution of the search warrant had been mailed to this address. The address was also provided to Washington Mutual Bank on an application opened in the name of TO, a known alias of RICHARD ADEKANBI (¶ 65). 104 Churn Road in Matteson is in the same neighborhood as ADESOKAN's former residence.

74. On or about March 5, 2007, two JPMorgan Chase credit card accounts in the name of LR (account numbers \*\*\*\*\*5260 and \*\*\*\*\*2789) were opened by internet applications. Seven other fraudulent applications were submitted to JPMorgan Chase from the same IP address. Among these identity theft victims are WM, RJ, and TM who are referred to

earlier in this affidavit regarding the credit card convenience check scheme (¶¶ 20-40). Bank records show that RABIU's cell phone number, (773) 780-6458, was used to call Washington Mutual Bank regarding the WM and TM accounts. Investigators recovered papers containing annotations concerning the Washington Mutual account into which the WM checks were deposited from RABIU'S residence during execution of a search warrant.

***CW Electronics Terminal***

75. Bank records show that on or about March 12, 2007, a Bank of America account (account number \*\*\*\*\*1397) was opened under the name CW Electronics with identity theft victim CW listed as a signatory on the account. Bank records also show that the address used to open the account was the CMRA mailbox at @ Mailboxes Plus opened by QUINTIN HENDERSON using the name CC.

76. On or about March 16, 2007, the CW Electronics/CW account was used to apply for a merchant account with First Data Merchant Services. The credit card terminal was subsequently mailed to the CMRA mailbox opened by HENDERSON. Between on or about March 31, 2007 and April 2, 2007, four fraudulent transactions were processed through the CW Electronics credit card terminal totaling approximately \$9,880. These funds were wired into the fraudulent CW Electronics/CW Bank of America account. Fraudulent customer invoices for CW Electronics were recovered from OLUSOLA AROJOJOYE'S computer flash drive.

***Creole Enterprise Management Company Terminal***

77. Records received from C & L Onestop Postal, a CMRA in Chicago, show that on or about March 7, 2007, TAJUDEEN RABIU rented mailbox 228 using the name and identifiers of KT. RABIU also listed Creole Enterprise Management Company on the CMRA

application as authorized to receive mail.

78. Bank of America records show that on or about March 22, 2007, the mailbox opened by RABIU was provided to Bank of America to open an account in the name of Creole Enterprises, with JG listed as a signatory on the account. On or about April 3, 2007, the Bank of America account number, and the fraudulent business name and address were used to open an account with First Data Merchant Services. Between on or about April 18, 2007 through May 1, 2007, 13 fraudulent transactions were processed through the fraudulently obtained Creole Enterprises credit card terminal totaling approximately \$13,198.

79. One of the credit card numbers keyed into the Creole Enterprise terminal was a JPMorgan Chase account opened under the name JB on January 7, 2007 (account number \*\*\*\*\*5256). Records received from Park Manor Mailboxes, a CMRA in Chicago, show that the address on the JB account was a mailbox rented by TAJUDEEN RABIU using the name and identifiers of RD. Approximately \$6,200 in fraudulent charges were made on the Creole Enterprise credit card terminal using the JB JPMorgan Chase credit card account.

80. Another of the credit card numbers keyed into the Creole Enterprise terminal was a JPMorgan Chase account opened under the name KG on April 18, 2007 (account number \*\*\*\*\*8731). On or about April 23, 2007 and April 25, 2007, charges totaling approximately \$1,938 were submitted to the terminal. Bank records show that on or about May 10, 2007, a check for approximately \$4,980 was drawn from the KG account payable to RD2 and deposited into an account in his name at Washington Mutual Bank. A fraudulent Social Security card and utility bill in the name RD2 were found on AROJOJOYE'S computer flash drive.

81. Another JPMorgan Chase credit card account used to submit fraudulent

charges to the Creole Enterprise terminal was opened using the name and identifiers of identity theft victim ML (account number \*\*\*\*\*2147), that was referred to earlier in this affidavit with regard to fraudulent convenience checks drawn from this account (§ 36). These charges totaled approximately \$1,947. On or about May 10, 2007, a check for approximately \$6,759 was drawn from the ML account and deposited into a Washington Mutual account in the name of JG (account number \*\*\*\*\*2137).

82. Bank records show that on or about February 27, 2007, two JPMorgan Chase credit card accounts were opened under the name JG. A fraudulent JG driver's license and utility bill were recovered from AROJOJOYE'S computer flash drive. One of the JG credit cards (account number \*\*\*\*\*3379) was used four times at the Creole Enterprise terminal for charges totaling approximately \$5,203.

#### *Plasma R Us Terminal*

83. CMRA records show that on or about March 14, 2007, QUINTIN HENDERSON rented mailbox 412 at Mailstop Junction, a CMRA in Chicago, using the name and identifiers of Washington Mutual Bank customer CC. Documents obtained from Mailstop Junction include a photograph of a CC identification document bearing HENDERSON's photograph. On the mailbox application, HENDERSON listed CJC Electronics, Plasma R Us, and OA as authorized to receive mail. This address was used to open a Bank of America account in the name of Plasma R Us with identity theft victim OA listed as a signatory (account number \*\*\*\*\*2467). On or about April 11, 2007, the account number, address, and business name were used to open a merchant account with First Data Merchant Services.

84. Between on or about April 18, 2007 and on or about April 19, 2007, five

fraudulent transactions were processed through the Plasma R Us credit card terminal totaling approximately \$9,511. One of the cards used in this terminal was in the name of AV (account number \*\*\*\*\*8046), which had also been used in the Creole Enterprise terminal. Another credit card in the name of DE was also used to submit a fraudulent charge to the Plasma R Us terminal (account number \*\*\*\*\*4935). A JPMorgan Chase credit card in the name of RG was used to submit fraudulent charges to the Plasma R Us terminal totaling approximately \$4115 (account number \*\*\*\*\*9837). Fraudulent Plasma R Us invoices reflecting the aforementioned credit card transactions were recovered from OLUSOLA AROJOJOYE'S computer flash drive.

***Right Choice Enterprises Terminal***

85. CMRA records show that on or about June 11, 2007, AROJOJOYE rented mailbox 463 at the UPS Store, a CMRA in Chicago, using the name and identifiers of identity theft victim LE. AROJOJOYE listed Right Choice Enterprises as an entity authorized to receive mail at this box, and provided as his home address on the application a CMRA mailbox referred to earlier in this affidavit (§ 32).

86. On or about June 26, 2007, mailbox 463 was used to open a Bank of America account under the name Right Choice Enterprises and identity theft victim SM (account number \*\*\*\*\*6184). On or about June 28, 2007, this account was used to open a merchant account with First Data Merchant Services. First Data Merchant Services mailed a credit card terminal to the mailbox opened by AROJOJOYE. From on or about June 30, 2007 through on or about July 11, 2007, 12 fraudulent transactions were submitted to the credit card terminal totaling approximately \$30,772. A fraudulent City of Chicago business license for Right Choice Enterprises



was recovered from AROJOJOYE'S computer flash drive, along with a fraudulent SM Social Security card and utility bill.

***Premium Home Remodeling Terminal***

87. CMRA records show that on or about October 9, 2007, KENNETH KORMOI rented mailbox 106 at @ Mailboxes Plus, a CMRA in Chicago, using the name and identifiers of identity theft victim GB. Documents obtained from @ Mailboxes Plus include a photocopy of a GB identification document bearing KORMOI's photograph. On November 11, 2007, this address was used to open an account at TCF Bank under the name Premium Remodeling Company with JF listed as a signatory on the account (account number \*\*\*\*\*8077). On that same date, another TCF account was opened in the name of JF, and an address of 16863 Bulger Ave., Hazel Crest, Illinois 60429 (account number \*\*\*\*\*7949). The Hazel Crest address was annotated on papers that were recovered from AROJOJOYE incident to his arrest. Investigators also recovered from AROJOJOYE JF Washington Mutual Bank checks.

88. On or about November 13, 2007, the mailbox opened by KORMOI was used to open a merchant account at First Data Merchant Services for Premium Remodeling Company. JF was identified as the owner of the company. First Data Merchant Services thereafter sent a credit card terminal to mailbox 463 opened by KORMOI. From on or about November 23, 2007 through on or about November 25, 2007, five fraudulent transactions were submitted to the Premium Remodeling Company credit card terminal totaling approximately \$12,467.

89. Three of the credit card numbers used in transactions at the Premium Remodeling Company terminal were also used for fraudulent transactions at a terminal issued to Ace 1 Entertainment (¶ 91). On or about November 25, 2007, a Bank of America credit card in the name

of identity theft victim MM (account number \*\*\*\*\*6087) was used at both merchant terminals for identical amounts of approximately \$2,489. Also on or about November 25, 2007, a Bank of America credit card in the name of identity theft victim JW (account number \*\*\*\*\*3756) was used at both merchant terminals for approximately \$2,500. The same day, a Bank of America credit card in the name of identity theft victim SH (account number \*\*\*\*\*1905) was used at the Premium Remodeling terminal for approximately \$2,500. On November 29, 2007, the same card was used for an identical amount at the Ace 1 Entertainment terminal.

90. All of the funds obtained from using the Premium Remodeling credit card terminal were deposited into the Premium Remodeling Company account at TCF Bank opened using the name JF. Fraudulent Premium Remodeling Company invoices, containing the card holders' true addresses, and a fraudulent Premium Home Remodeling business license, was recovered from OLUSOLA AROJOJOYE'S computer flash drive. In addition, at the time of his March 5, 2008 arrest, AROJOJOYE had in his possession a counterfeit JF Texas driver's license bearing his picture, and Washington Mutual Bank checks bearing both JF's name and the Hazel Crest address that was used to open accounts in the name of JF and Premium Remodeling Company.

*Ace One Entertainment Terminal*

91. Also recovered from AROJOJOYE incident to his arrest were two Postal money order receipts. Postal Service records show that two \$1000 money orders associated with the receipts were purchased on November 16, 2007 in Atlanta, Georgia. Postal Service documents further show that both money orders were purchased with a Wachovia Bank debit card issued to the aforementioned Ace 1 Entertainment (account number \*\*\*\*\*5016). At least two additional

\$1,000 money orders were purchased with this card and made payable to AROJOJOYE, and one \$1,000 money order was made payable to ADESOKAN. The signatories on this Wachovia account were identity theft victims MW and LR, and the address on the account was another CMRA located at 2566 Shallowford Road, Atlanta. A fraudulent utility bill and lease agreement in LR's name were recovered from AROJOJOYE'S computer flash drive. In addition, passport photographs were recovered from AROJOJOYE'S vehicle incident to his arrest, which contained the image of the person purporting to be LR.

92. On or about October 15, 2007, the Shallowford Road CMRA address was provided to First Data Merchant Services on a merchant application for ACE 1 Entertainment. The application listed LR as the owner, and requested that credit card funds be sent to a Wachovia account in LR's name (account number \*\*\*\*\*9488). Between approximately October 24, 2007 and November 16, 2007, 17 fraudulent transactions were processed through the Ace 1 Entertainment credit card terminal totaling approximately \$34,761.

*SS Construction Terminal*

93. On or about December 28, 2007, QUINTIN HENDERSON rented mailbox 122 at Sibley Currency Exchange, a CMRA in South Holland, Illinois, using the name and identifiers of identity theft victim JF. CMRA records show that HENDERSON had presented the CMRA with a counterfeit Texas driver's license with JF's name and his photo. The CMRA rental form also contained a copy of another Texas driver's license in the name of SS that had a photograph of another unknown individual.

94. On or about January 2, 2008, First Data Merchant Services received an application from SS Construction, which listed SS as the owner and requested that funds be sent to

an account in that name at Bank of America (account number \*\*\*\*\*0754). The address listed on the application was mailbox 122 rented by HENDERSON at Sibley Currency Exchange. Between approximately January 10, 2008 and January 18, 2008, five fraudulent transactions were entered into the SS Construction terminal totaling approximately \$9,595. A fraudulent SS Construction City of Chicago business license and a SS driver's license were recovered from AROJOJOYE'S computer flash drive. In addition, investigators recovered from AROJOJOYE papers containing SS's date of birth and Social Security number.

*Seizure of ADESOKAN's Vehicle*

95. Based on a review of a Department of the Treasury currency transaction report (CTR), on or about April 30, 2008, ADEMOLA ADESOKAN purchased an Infinity automobile, VIN JNKBYO1E96M204744, from Infiniti of Gwinnett in Georgia. According to the CTR, ADESOKAN purchased the vehicle for \$40,600, including \$6,300 in United States Currency and two Bank of America cashier's checks totaling \$34,300.

96. As part of my investigation, I have reviewed ADESOKAN's bank records, including those from his Bank of America accounts. The Bank of America account from which ADESOKAN withdrew funds for one of the cashier's checks used to purchase the Infiniti contains funds that I believe to be proceeds of the scheme described in this affidavit. My review of bank and Postal Service records show that ADESOKAN deposited several money orders purchased with debit cards linked to fraudulent accounts into his Bank of America account. Moreover, through my investigation into ADESOKAN's finances I have determined that he does not appear to have any legitimate source of income that would justify his lawful purchase of a \$40,000 automobile. I believe, therefore, that ADESOKAN purchased the Infiniti automobile with funds that had been co-

mingled with proceeds of the scheme described herein.

Conclusion

97. I believe that based on the above information there is probable cause to believe that ADEMOLA ADESOKAN, TAJUDEEN RABIU, OLUSOLA AROJOJOYE, RICHARD ADEKANBI, EDWARD ADEKANBI, AKEEM OGUNSEGUN, KENNETH KORMOI, and QUINTIN HENDERSON have participated in a scheme to defraud financial institutions, including Honeywell Federal Credit Union, Bank of America, JPMorgan Chase, LaSalle Bank, Charter One Bank, Fifth Third Bank, TCF Bank, and Washington Mutual Bank, in violation of Title 18, United States Code, Section 1341, 1343, and 1344, and committed aggravated identity theft, in violation of Title 18, United States Code, Section 1028A.

98. I believe that based on the above information there is probable cause to believe that the following personal property is derived from proceeds traceable to a violation of the mail, wire, and bank fraud statutes, 18 U.S.C. §§ 1341, 1343 and 1344, and thus are subject to civil forfeiture pursuant to 18 U.S.C. § 981(a)(1)(D): one 2006 Infiniti M45-V8, VIN JNKBYO1E96M204744, registered to ADEMOLA ADESOKAN.

FURTHER AFFIANT SAYETH NOT.

  
MARTIN BRICE  
Inspector, Postal Inspection Service

SUBSCRIBED AND SWORN to before me on April 20, 2009.

  
HON. JEFFREY COLE  
United States Magistrate Judge